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May 22, 2002

**VIA ELECTRONIC MAIL AND FEDERAL EXPRESS**

Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: D.T.E. 02-8 – Investigation by the Department of Telecommunications and Energy on its own Motion, pursuant to G.L. c. 159, §§ 12 and 16, into the collocation security policies of Verizon New England Inc. d/b/a Verizon Massachusetts

Dear Ms. Cottrell:

Please accept this letter in reply to comments filed by Verizon Massachusetts (“Verizon”) in the above captioned matter. Verizon’s comments reply to motions to compel filed by XO Massachusetts, Inc. (“XO”) and Allegiance Telecom of Massachusetts, Inc. (“Allegiance”). AT&T filed comments in support of the motions. XO urges the Department to grant both motions.

Verizon has provided no compelling reason for the motions to be denied and simply states that providing the requested information “would be unduly burdensome, unnecessary and unreasonable.” *Verizon reply at 1*. Verizon also argues that cost estimates are premature “since costs are a function of the type of security plan adopted by the Department. *Id. at 4*. This “chicken and the egg” argument must be resolved by the Department so that carriers at least know how much the chicken or egg will cost regardless of which one comes first.

At the same time Verizon claims that cost information is burdensome, unnecessary and unreasonable, Verizon has proposed a security plan that is unduly burdensome, unnecessary and unreasonable (especially without any cost data available) to the carriers that will be expected to pay for implementing the Verizon plan if its plan is approved by the Department. Verizon’s agreement to minimize “the costs passed on to collocated carriers” as stated in its Panel Testimony at 40-41 is not enough to make cost data unnecessary or unreasonable in the Department’s consideration of Verizon’s plan.

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It is difficult to imagine any information that is more reasonable and necessary to this proceeding than the costs to implement Verizon's plan. As the Department is aware, the telecommunications industry has been hard hit recently by the weakening economy. Cost data for implementing Verizon's plan are necessary and reasonable. The Department should require Verizon to provide revised information requests as requested in the XO and Allegiance motions.

Please file the original and four (4) copies and return the additional copies to me marked "filed" in the enclosed envelope. Please contact me if you have any questions or require additional information.

Sincerely,

/s/ Karen Nations

Karen Nations

Cc: Joan Foster Evans (2 copies)  
Service list (via electronic mail and first class mail)